AMENDMENTS TO THE DRAWINGS:

The attached drawing sheets include changes to Fig. 5, where Fig. 5 has been renumbered as Fig. 3.

Please delete Figs. 3 and 4 of the original drawings.

Attachment: Replacement Sheets
Annotated Sheets Showing Changes

REMARKS

Summary of the Office Action

In the Office Action, the drawings, specification and claims 6, 7 and 9 stand objected to for minor informalities.

Claim 8 stands rejected under 35 U.S.C. § 112, 1st Paragraph.

Claims 1-7 stand rejected under 35 U.S.C. § 102 (b), as being anticipated by U.S. Patent No. 5,906,450 to *Ng*.

Claims 1, 3-7 and 9 stand rejected under 35 U.S.C. § 102 (b), as being anticipated by U.S. Patent No. 6,431,602 to *Ralko*.

Summary of the Response to the Office Action

Applicant proposes canceling claim 6, amending the specification and drawings, amending claims 1, 2 and 9, and adding new claims 11-16. Accordingly, claims 1-5 and 7-16 are pending for further consideration.

Objection to the Drawings

In the Office Action, the drawings stand objected to for failing to disclose the hard stop recited in claim 8, and the instrument panel recited in claim 9.

With regard to the hard stop recited in dependent claim 8, Applicant respectfully directs the Examiner's attention to page 4, line 29 to page 5, line 2 of the specification, which recite:

> "Preferably, the threaded tubes may be adjusted to a desired position independently of one another according to a preferred embodiment of the invention. The threaded bolt is arranged to slide against an insert of a corresponding threaded tube when said threaded tube having reached a hard stop. The hard stop is preferably a predetermined threshold value, for which the coupling arrangement is designed. Hence the risk for inducing excessive stress or strain to the coupling arrangement is reduced by using this principle for the inserts in combination with the inventive coupling arrangement."

Thus, as described in the specification, the hard stop is a "predetermined threshold value" which allows for the threaded bolt to slide against an insert of a corresponding threaded tube.

With regard to dependent claim 9, Applicant respectfully directs the Examiner's attention to original Fig. 5 (now Fig. 3) of the original drawings, which shows an instrument panel at element 11, (see also page 9, lines 3-7).

Applicant therefore respectfully requests withdrawal of the objection to the drawings.

Objection to the Specification

In the Office Action, the specification stands objected to for minor informalities. Specifically, the Office Action requires an abstract including less than 150 words, and correction of various informalities in the disclosure.

As requested in the Office Action, Applicant herewith submits a new abstract including less than 150 words, and correcting various informalities in the disclosure, as shown above.

Applicant therefore respectfully requests withdrawal of the objection to the specification.

Objection to the Claims

In the Office Action, claims 6, 7 and 9 stand objected to for minor informalities.

In response to the objection to claims 6, 7 and 9, Applicant proposes canceling claim 6, and amending claim 9 as per the suggestion in the Office Action. With regard to claim 7, Applicant respectfully notes that claim 7 is now in proper format per the proposed amendments to independent claim 1.

Applicant therefore respectfully requests withdrawal of the objection to the claims.

Rejection under 35 U.S.C. § 112, 1st Paragraph

In the Office Action, claim 8 stands rejected under 35 U.S.C. § 112, 1st Paragraph.

Specifically, the Office Action indicates that the specification does not describe how or what enables the threaded tube to "reach" a hard stop.

As discussed above, with regard to the hard stop recited in dependent claim 8, Applicant respectfully directs the Examiner's attention to page 4, line 29 to page 5, line 2 of the specification, which recite:

> "Preferably, the threaded tubes may be adjusted to a desired position independently of one another according to a preferred embodiment of the invention. The threaded bolt is

arranged to slide against an insert of a corresponding threaded tube when said threaded tube having reached a hard stop. The hard stop is preferably a predetermined threshold value, for which the coupling arrangement is designed. Hence the risk for inducing excessive stress or strain to the coupling arrangement is reduced by using this principle for the inserts in combination with the inventive coupling arrangement."

Thus, as described in the specification, the hard stop is a "predetermined threshold value" which allows for the threaded bolt to slide against an insert of a corresponding threaded tube.

Applicant therefore respectfully requests withdrawal of the rejection of claim 8 under 35 U.S.C. § 112, 1st Paragraph.

All Claims are Allowable

In the Office Action, claims 1-7 stand rejected under 35 U.S.C. § 102 (b), as being anticipated by U.S. Patent No. 5,906,450 to *Ng*. Claims 1, 3-7 and 9 stand rejected under 35 U.S.C. § 102 (b), as being anticipated by U.S. Patent No. 6,431,602 to *Ralko*. Applicant respectfully traverses the rejection of claims 1-7 and 9 for the following reasons.

With regard to independent claim , Applicant respectfully asserts that *Ng* and *Ralko*, whether viewed singly or in combination, do not teach or fairly suggest a coupling arrangement for enabling fixing of a structure member to a body structure member, the coupling arrangement including, "at least two externally threaded tubes, one of said externally threaded tubes provided in a first end portion of an internally threaded passage through a housing and threadedly engaged with said internally threaded passage, and another one of said externally threaded tubes provided in a second opposite end portion of said internally threaded passage and threadedly engaged with said internally threaded passage, said housing being fixed attachable in relation to said structure members, wherein a threaded bolt is arranged through said internally threaded passage and said threaded bolt is adapted to connect said body structure member to said structure member in a coupling position, from which coupling position said threaded bolt, via inserts provided in said externally threaded tubes, enables adjusting operations of said threaded tubes in opposite directions along said threaded bolt, so that said threaded tubes are adjustable to a respective fixed position by turning the threaded bolt," as recited in independent claim 1, as amended.

Support for these features recited in claim 1 can be found at least on pages 6-10 of the originally filed specification, and in Figs. 1-3 of the drawings. Specifically, as shown in Figs. 1-3, the present invention discloses a coupling arrangement for enabling fixing of a structure member 11 to a body structure member 12. The coupling arrangement includes at least two externally threaded tubes 3, 4. One of the externally threaded tubes (i.e. tube 3) is provided in a first end portion of an internally threaded passage through a housing 2 and threadedly engaged with the internally threaded passage. Further, another one of the externally threaded tubes (i.e. tube 4) is provided in a second opposite end portion of the internally threaded passage and threadedly engaged with the internally threaded passage. With the housing fixedly attached in relation to the structure members, a threaded bolt 10 is arranged through the internally threaded passage and the threaded bolt is adapted to connect body structure member 12 to structure member 11 in a coupling position. In the coupling position, the threaded bolt, via inserts 5 provided in the externally threaded tubes, enables adjusting operations of the threaded tubes in opposite directions along the threaded bolt, so that the threaded tubes are adjustable to a respective fixed position by turning the threaded bolt.

The Office Action cites *Ng* and/or *Ralko* as teaching or suggesting the coupling arrangement recited in claims 1-7 and 9.

Specifically, *Ng*, as illustrated in Figs. 6-8 thereof and described in Col. 3:38 – Col. 4:47, discloses a turnbuckle 50 including an internally threaded hollow body 51 having an externally threaded member 58 engaged with body 51. Body 51 further includes an externally threaded ring shaped end structure 66 threadedly engaged with threaded opening 63 of body 51. A second ring shaped end structure 71 is disposed at hexagonal base end 59 of member 58, and threadedly engaged with threaded opening 64.

Contrary to the recitation in independent claim 1 of the present invention, turnbuckle 50 of *Ng* differs from the present invention coupling arrangement in at least the following respects.

For example, whereas externally threaded member 58 is engaged with internally threaded hollow body 51 in a first passage formed as shown in Fig. 8 of *Ng*, and ring shaped end structure 66 is threadedly engaged with a second threaded opening 63 of body 51, for the present invention, externally threaded tubes 3, 4 are threadedly engaged in the same threaded passage of housing 2 (see Fig. 2a of the present invention). Accordingly, *Ng* clearly does not teach or

suggest, "one of said externally threaded tubes provided in a first end portion of an internally threaded passage through a housing and threadedly engaged with said internally threaded passage, and another one of said externally threaded tubes provided in a second opposite end portion of said internally threaded passage and threadedly engaged with said internally threaded passage," as recited in independent claim 1, as amended.

Referring next to the teachings of *Ralko*, as shown in Fig. 3A of *Ralko*, there is disclosed a coupling apparatus 10 including a first coupling structure 20, a second coupling structure 22, an attachment member 24 and a coupling member 26. As clearly noted in the outstanding Official Action, coupling members 20, 22 are provided in "the same end portion" of a passage through housing 60 (denoted as threaded nut 60 in *Ralko*).

Accordingly, contrary to the teachings of *Ralko*, whereas coupling members 20, 22 are provided in "the same end portion" of a passage through housing (i.e. nut) 60, for the present invention, as shown in Fig. 2a, one externally threaded tube 3 is provided in a first end portion of the internally threaded passage through housing 2, and the other externally threaded tube 4 is provided in a second opposite end portion of the internally threaded passage. Accordingly, *Ralko* clearly does not teach or suggest, "one of said externally threaded tubes provided in a first end portion of an internally threaded passage through a housing and threadedly engaged with said internally threaded passage, and another one of said externally threaded tubes provided in a second opposite end portion of said internally threaded passage and threadedly engaged with said internally threaded passage," as recited in independent claim 1, as amended.

Based upon the clear distinctions noted above between the recitation in independent claim 1 of the present invention, and the teachings of *Ng* and *Ralko*, Applicant respectfully asserts that *Ng* and/or *Ralko*, whether viewed singly or in combination, do not teach or fairly suggest a coupling arrangement for enabling fixing of a structure member to a body structure member, the coupling arrangement including, "at least two externally threaded tubes, one of said externally threaded tubes provided in a first end portion of an internally threaded passage through a housing and threadedly engaged with said internally threaded passage, and another one of said externally threaded tubes provided in a second opposite end portion of said internally threaded passage and threadedly engaged with said internally threaded passage, said housing being fixed attachable in relation to said structure members, wherein a threaded bolt is arranged

through said internally threaded passage and said threaded bolt is adapted to connect said body structure member to said structure member in a coupling position, from which coupling position said threaded bolt, via inserts provided in said externally threaded tubes, enables adjusting operations of said threaded tubes in opposite directions along said threaded bolt, so that said threaded tubes are adjustable to a respective fixed position by turning the threaded bolt," as recited in independent claim 1, as amended.

As pointed out in MPEP § 2131, "[t]o anticipate a claim, the reference must teach every element of the claim." "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. Of California*, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987). Moreover, as pointed out in M.P.E.P. § 2143.03, "[t]o establish prima facie obviousness of a claimed invention, all the claimed limitations must be taught or suggested by the prior art". *In re Royka*, 409 F.2d 981, 180 USPQ 580 (CCPA 1974). Since these criteria have not been met, Applicant respectfully asserts that the rejections under 35 U.S.C. § 102 (b) should be withdrawn because *Ng* and/or *Ralko* do not teach or suggest each feature of independent claim 1.

In view of the above arguments, Applicant respectfully requests the rejection of independent claim 1 under 35 U.S.C. § 102 be withdrawn. Additionally, claims 2-5 and 7-8, which depend from independent claim 1, are allowable at least because their base claim is allowable, as well as for the additional features recited therein.

Independent claim 9

With regard to independent claim 9, Applicant respectfully asserts that *Ng* and *Ralko*, whether viewed singly or in combination, do not teach or fairly suggest a vehicle body having "a coupling arrangement wherein the coupling arrangement includes at least two externally threaded tubes, one of said externally threaded tubes provided a first end portion of ~~a~~ an internally threaded passage through a housing and threadedly engaged with said internally threaded passage, and another one of said externally threaded tubes provided in a second opposite end portion of said internally threaded passage and threadedly engaged with said internally threaded passage, the housing being fixed attachable in relation to a body structure member and a structure member, wherein a threaded bolt is arranged through said internally

threaded passage and the threaded bolt is adapted to connect said body structure member to the structure member in a coupling position, from which coupling position said threaded bolt, via inserts provided in said externally threaded tubes, enables adjusting operations of the threaded tubes in opposite directions along said threaded bolt, so that the threaded tubes are adjustable to a respective fixed position by turning the threaded bolt, the vehicle body comprising: said coupling arrangement interconnecting an instrument panel structure and an A-pillar section, wherein the instrument panel structure is the structure member and the A-pillar section is the body structure member," as recited in independent claim 9, as amended.

Applicant respectfully asserts that independent claim 9 is allowable for at least the reasons presented above for the allowance of independent claim 1, and the additional features recited therein. In the interest of avoiding redundant arguments, the reasons for the allowance of independent claim 9 are not repeated herein.

New Independent claim 10

With regard to new independent claim 9, Applicant respectfully asserts that *Ng* and *Ralko*, whether viewed singly or in combination, do not teach or fairly suggest a coupling arrangement for fixing a first structure member to a second structure member in a vehicle, the coupling arrangement including, "a housing having an internally threaded passage and being fixedly attachable in relation to the structure members; at least two externally threaded tubes disposed in said internally threaded passage, one of said externally threaded tubes provided in a first end portion of said internally threaded passage and threadedly engaged with said internally threaded passage, and another one of said externally threaded tubes provided in a second opposite end portion of said internally threaded passage and threadedly engaged with said internally threaded passage; and a threaded bolt arranged through said internally threaded passage, said threaded bolt being adapted to connect said first structure member to said second structure member in a coupling position, from which coupling position said threaded bolt, via inserts provided in said externally threaded tubes, enables adjusting operations of said threaded tubes in opposite directions along said threaded bolt, so that said threaded tubes are adjustable to a respective fixed position by turning said threaded bolt," as recited in independent claim 10.

Applicant respectfully asserts that new independent claim 10 is allowable for at least the reasons presented above for the allowance of independent claim 1, and the additional features recited therein. Additionally, claims 11-16 which depend from independent claim 10, are allowable at least because their base claim is allowable, as well as for the additional features recited therein.

CONCLUSION

In view of the foregoing, Applicant respectfully requests reconsideration and the timely allowance of the pending claims. Should the Examiner feel that there are any issues outstanding after consideration of the response, the Examiner is invited to contact the Applicant's undersigned representative to expedite prosecution.

If there are any other fees due in connection with the filing of this response, please charge the fees to our Deposit Account No. 04-2223. If a fee is required for an extension of time under 37 C.F.R. §1.136 not accounted for above, such an extension is requested and the fee should also be charged to our Deposit Account.

Respectfully submitted,

DYKEMA GOSSETT PLLC

Dated: August 26, 2005

By: _____
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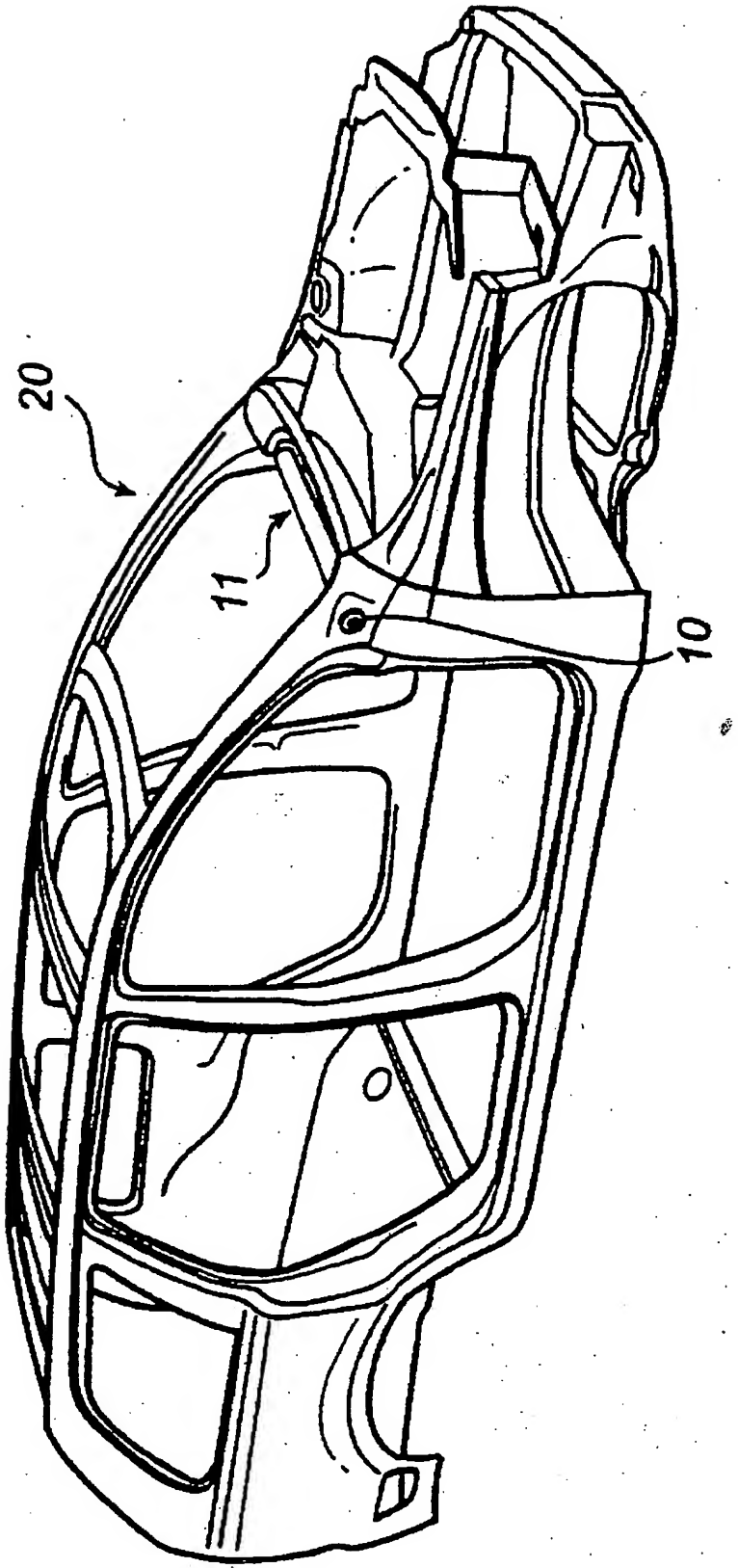

Fig. 3

Fig. 5 renumbered as Fig. 3